

COHEN JOHNSON LLC
375 E. Warm Springs Road, Suite 104
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

1 **COHEN JOHNSON LLC**
2 **H. STAN JOHNSON, ESQ.**
3 Nevada Bar No.: 00265
4 375 E. Warm Springs Road, Ste. 104
5 Las Vegas, NV 89119
6 Telephone: (702) 823-3500
7 Facsimile: (702) 823-3400
8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **IMAGEKEEPER LLC, a Nevada Limited**
12 **Liability Company,**

13 **Plaintiff,**

14 **vs.**

15 **WRIGHT NATIONAL FLOOD INSURANCE**
16 **SERVICES, LLC, a Delaware Limited Liability**
17 **Company,**

18 **Defendants.**

Case No.: 2:20-CV-01470-GMN-VCF

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
DEADLINES RELATED TO
DEFENDANT'S MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT [ECF NO.1] [ECF NO.
59]**

[FIRST REQUEST]

19 COMES NOW, Plaintiff, ImageKeeper, LLC, ("ImageKeeper") by and through its
20 counsel of record, H. Stan Johnson, Esq. of Cohen Johnson Parker Edwards, and Defendant
21 Wright National Flood Insurance Services, LLC, ("Wright") by and through their respective
22 counsel of record, do hereby stipulate and agree as follows:

23 WHEREAS Defendant Wright filed their Motion to Dismiss Plaintiff's Complaint on
24 September 23, 2020 (ECF No. 59)("Motion");

25 WHEREAS Plaintiff's current deadline to file and serve its Response to Plaintiff's Motion
26 ("Response") was set as **Wednesday, October 7, 2020;**

27 WHEREAS as Plaintiff requires additional time to respond to Defendant's Motion, the
28 parties have agreed to extend the deadline for Plaintiff to file and serve their Response;

WHEREAS, the parties have met and conferred and have stipulated and agreed to extend the response deadlines to Defendant's Motion as follows:

- Plaintiff ImageKeeper shall have until **Wednesday, October 21, 2020**, to file its Response to Defendant's Motion (ECF No. 59).
- Defendant Wright shall have until **seven (7) days** after Plaintiff has filed its Response to file any Reply (LR 7-2 (b)).
- The Court has not yet set a hearing date on Defendant's Motion; therefore, no rescheduling of a hearing date is necessary at this time.

WHEREAS, the parties respectfully request that this Court order the following and submit that this, their first such stipulation and request for an extension of the above-deadlines, is submitted in good faith and not for the purposes of delay:

- Plaintiff ImageKeeper shall have until **Wednesday, October 21, 2020**, to file its Response to Defendant's Motion (ECF No. 59).
- Defendant Wright shall have until **seven (7) days** after Plaintiff has filed its Response to file any Reply (LR 7-2 (b)).

DATED this _____ day of October 2020

DATED this _____ day of October 2020

COHEN JOHNSON LLC

DUANE MORRIS LLP

BY: /s/ H. Stan Johnson

BY: /s/ Daniel B. Heidtke

H. STAN JOHNSON (SBN 0265)
STEVEN B. COHEN (SBN 2327)

DOMINICA C. ANDERSON (SBN 2988)
DANIEL B. HEIDTKE (SBN 12975)

POLSINELLI LLP
COBLY B. SPRINGER
BARRINGTON E. DYER
TERI H.P. NGUYEN
MIYA YUSA

Attorneys for Defendant

Attorneys for Plaintiff

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IMAGEKEEPER LLC, a Nevada Limited
Liability Company,

Plaintiff,

vs.

WRIGHT NATIONAL FLOOD INSURANCE
SERVICES, LLC, a Delaware Limited Liability
Company,

Defendants.

Case No.: 2:20-CV-01470-GMN-VCF

**ORDER GRANTING EXTENSION
OF DEADLINES RELATED TO
DEFENDANT'S MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT [ECF NO. 59]**

[FIRST REQUEST]

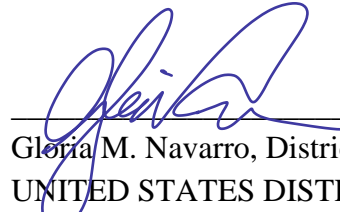
Plaintiff ImageKeeper LLC ("ImageKeeper") and Defendant Wright National Flood Insurance Services, LLC ("Wright") have stipulated and agreed as follows: ImageKeeper shall have until **Wednesday, October 21, 2020**, to file its Response to Wright's Motion to Dismiss Plaintiff's Complaint filed on September 23, 2020 (ECF No. 59); Wright shall have until **seven (7) days** after ImageKeeper files its Response to file its Reply. *See* LR 7-2(b).

GOOD CAUSE APPEARING THEREFORE:

ImageKeeper's Response to Wright's Motion to Dismiss Plaintiff's Complaint [ECF No. 59] shall be filed on or before **Wednesday, October 21, 2020**;

Wright's Reply to ImageKeeper's Response shall be filed **seven (7) days** after ImageKeeper files their Response to Wright's Motion to Dismiss Plaintiff's Complaint.

IT IS SO ORDERED this 8 day of October 2020.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT